

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

**THE ESTATE OF YARON UNGAR, et al.**

**v.**

**No. 00 - 105L-DLM**

**THE PALESTINIAN AUTHORITY, et al.**

**PLAINTIFFS' MOTION TO ENLARGE**

Plaintiffs hereby move the Court to enlarge the period of time in which to file their response to defendants' Motion for Relief from Default Judgment, docket #408. Plaintiffs request an enlargement until February 6, 2008.

Plaintiffs' motion is supported by the attached memorandum. A proposed order is also attached.

Plaintiffs, by their Attorney,

/S/ David J. Strachman  
David J. Strachman #4404  
McIntyre, Tate & Lynch LLP  
321 South Main Street, Suite 400  
Providence, RI 02903  
(401) 351-7700  
(401) 331-6095 (fax)

CERTIFICATION

I hereby certify that on February 1, 2008 I served this motion along with the attached memorandum and proposed order via ECF to the following counsel of record:

Deming E. Sherman  
Edwards Angell Palmer & Dodge LLP  
2800 Bank Boston Plaza  
Providence, RI 02903

Richard A. Hibey  
Mark J. Rochon  
Miller & Chevalier Chartered.  
655 Fifteenth Street, N.W., Suite 900  
Washington, DC 20005-5701

/S/ David J. Strachman

**UNITED STATES DISTRICT COURT  
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**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION TO ENLARGE**

Plaintiffs respectfully request that the Court enlarge until February 6, 2008 the period in which to respond to Defendants' Motion for Relief from Default Judgment, docket # 408.

On December 28, 2007, Defendants filed a motion for relief from the final judgment entered in this matter on July 13, 2004.

The original response deadline was January 17, 2008.

On January 16, 2008, Plaintiffs sought enlargement of their time to file a response to the Defendants' motion until February 1, 2008.

On January 17, 2008 the Court granted Plaintiffs' first motion to enlarge.

Plaintiffs now more for an additional enlargement of 5 days or until February 6, 2008 to respond to Defendants' motion.

The bases for Plaintiffs' first motion for enlargement were:

Defendants' filing is more than 50 pages in length, references more than two dozen exhibits, and makes numerous legal, factual and political arguments in support of the relief requested. Naturally, Plaintiffs desire to thoroughly respond to these arguments and intend to do so.

However, Plaintiffs are in need of additional time to file their response to Defendants' motion for several reasons, including but not limited to counsel's trial and court schedule and out of state travel.

Additionally, Plaintiffs intend to include with their response memorandum several foreign language documents that require translation. The translator has indicated that additional time is needed to complete the translations.

Plaintiffs need an additional enlargement of five days largely because their Arabic translator has not completed translations of several items which are vital to Plaintiffs' response pleadings. The translator has informed counsel that his work should be completed by February 4, 2008 and counsel will need two days to review the translations and integrate them into Plaintiffs' response memorandum.

A further five day enlargement could not prejudice the Defendants as final judgment entered almost three and a half years ago and since Defendants, by their own admission, have deliberately and strategically delayed and timed the filing of their present motion to gain a perceived advantage.

In light of the Defendants' calculated filing and the history of this case, an additional five day enlargement is not unreasonable.

Wherefore, Plaintiffs respectfully request that the Court grant their request for enlargement until February 6, 2008.

Plaintiffs, by their Attorney,

/s/David J. Strachman

David J. Strachman #4404

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